

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) RANDY BLAKE PATTERSON,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. CIV-2015-1204-HE
(1) NATIONAL BOARD OF MEDICAL)	
EXAMINERS,)	
)	
Defendant.)	

**DEFENDANT'S NOTICE OF INTENTION TO
REQUEST PRODUCTION OF DOCUMENTS FROM
OKLAHOMA CHRISTIAN UNIVERSITY**

Pursuant to Fed.R.Civ.P. 45 and L.Cv.R. 45.1(a), Defendant, National Board of Medical Examiners ("NBME"), hereby gives Notice of its intent to serve the attached Subpoena, requesting the production of documents, on Oklahoma Christian University,

DATE: June 15, 2016

Respectfully Submitted,

/s/ Amy L. Alden

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Amy L. Alden, OBA No. 16978
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Attorneys for Defendant,

National Board of Medical Examiners

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based upon the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Steven E. Clark, OBA No. 1712

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/s/ Amy L. Alden

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

(1) RANDY BLAKE PATTERSON

Plaintiff

(1) NATIONAL BOARD OF MEDICAL EXAMINERS,

Defendant

Civil Action No. CIV-2015-1204-HE

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

OKLAHOMA CHRISTIAN UNIVERSITY
2501 East Memorial Road, Edmond, OK 73013

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: SEE EXHIBIT A, attached hereto and incorporated herein by reference

Place: MILLER DOLLARHIDE, P.C. 210 Park Avenue, Suite
2550, Oklahoma City, OK 73102 OR
to the below email addresses

Date and Time:

07/06/2016 5:00 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/15/2016

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Defendant,
National Board of Medical Examiners, who issues or requests this subpoena, are:
Jack S. Dawson, Esq., Amy L. Alden, Esq., and Andrea R. Rust, Esq., 210 Park Avenue, Suite 2550, Oklahoma City,
OK 73102 (405) 236-8541; jdawson@millerdollarhide.com; aalden@millerdollarhide.com; arust@millerdollarhide.com

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

I. Instructions and Definitions

1. The terms “Oklahoma Christian”, “you”, and “your” shall mean Oklahoma Christian University, Cascade College (Oregon) and any of their agents, representatives, employees and/or assigns.
2. The term “Plaintiff” or “Dr. Patterson” shall refer to Randy Blake Patterson, DOB 06/17/xxxx.
3. The terms “and” and “or” shall each refer to “and/or,” whichever use makes the request most inclusive.
4. The term “communication” shall mean any transmission of information from one person or persons to another person or persons, regardless of the medium by which such communication occurred, including by way of example, emails.
5. The term “document” or “documents” shall be construed in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure and includes but is not limited to, every writing or record of every type and description that is in the possession, custody or control of you, including but not limited to correspondence (interoffice, intra-office or otherwise), communications, letters, memoranda, notices, confirmations, summaries or records of conversations, voice and sound recordings, films, electronic mail, computer data and any other form of electronic, magnetic, or computerized media, telephone recordings and transcriptions, photographs, notebooks, summaries or reports of physicians or consultants, pamphlets, notes from telephone conversations, agreements, reports, memoranda, studies, summaries, minutes, notes, instructions, manuals, any marginal comments or post-it notes appearing on any documents, and all other written, printed, computerized, computer-stored or maintained, or typed information of any nature whatsoever.
6. Included in the definition of “document” or “documents” as used herein are files, file folders, electronic files, electronic file folders, and any other computerized, computer-stored or maintained files or file folders. Accordingly, produce files and file folders together with the documents they contain.
7. The term “concerning,” “relating to,” “reflecting,” and “referring to” shall mean constituting, evidencing, mentioning, describing, pertaining to, responding to, used or relied upon in preparation of or in conjunction with, or being connected in any way, either directly or indirectly.

8. For purposes of these requests, the use of the singular shall be construed as the use of the plural and *vice versa*; “any” includes “all” and *vice versa*; “each” includes “every” and *vice versa*; and the masculine includes the feminine and *vice versa*.

II. Requests to Produce Documents

1. Please produce copies of all documents submitted by Randy Blake Patterson or on his behalf to your school from January 1, 2004 to the present date, including but not limited to any and all applications for admission to Oklahoma Christian University or Cascade College.
2. Produce any student file(s) maintained by Oklahoma Christian University or Cascade College pertaining to Randy Blake Patterson from January 1, 2004 to the present date.
3. Produce all documents from January 1, 2005 to the present date pertaining to Randy Blake Patterson’s academic performance while a student at Oklahoma Christian University or Cascade College, including but not limited to academic transcripts and performance evaluations.
4. Produce all disciplinary records from January 1, 2005 to the present date relating to Randy Blake Patterson while a student at Oklahoma Christian University or Cascade College, including but not limited to academic disciplinary records and disciplinary records relating to personal conduct.
4. Produce copies of all documents showing any degrees conferred upon Randy Blake Patterson by Oklahoma Christian University or Cascade College from January 1, 2005 to the present date.
5. Produce all documents, if not covered by other categories of documents described herein, reflecting whether Randy Blake Patterson graduated with distinction from Oklahoma Christian University or Cascade College and, if so, the level of distinction with which any academic degree was earned, from January 1, 2005 to the present date.
6. Please produce copies of all documents pertaining to Randy Blake Patterson’s status as a student athlete at Oklahoma Christian University from approximately 2004-2009, including but not limited to documents reflecting his participation on the men’s track and field team (such as official roster(s)), number of letters, if any, awarded to Randy Blake Patterson, awards, accomplishments, and/or honors received by Randy Blake Patterson during his tenure on the men’s track and field team, and Sooner Athletic Conference track and field championship meet results.